

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

X

NICOLE P. ERAMO,	:	
	:	Case No. 3:15-cv-00023-GEC
Plaintiff,	:	
	:	
- against -	:	
	:	
ROLLING STONE LLC, SABRINA RUBIN	:	
ERDELY, AND WENNER MEDIA LLC,	:	
	:	
Defendants.	:	
	:	
	X	

**DEFENDANTS' MOTION TO STAY ENFORCEMENT OF THE JUDGMENT
PENDING DISPOSITION OF DEFENDANTS' RULE 50(B) MOTION**

Defendants Rolling Stone, LLC, Wenner Media, LLC and Sabrina Rubin Erdely (“Defendants”), by counsel, move the Court for an order staying enforcement of the judgment entered in this action on November 7, 2016 (Dkt. 387), pending disposition of Defendant's renewed motion for judgment as a matter of law under Federal Rule of Civil Procedure 50(b).

This motion is based on Rule 62(b) of the Federal Rules of Civil Procedure and is made on the ground that there are significant legal issues presented in Defendants' Rule 50(b) motion that may set aside the judgment against one or more of the Defendants or reduce or eliminate the amount of the judgment in the event of a favorable ruling. A Proposed Order setting forth the relief requested is attached hereto as Exhibit A.

Dated: New York, New York
December 5, 2016

DAVIS WRIGHT TREMAINE LLP

By: /s/ Elizabeth A. McNamara

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*Attorneys for Defendants Rolling Stone LLC,
Sabrina Rubin Erdely, and Wenner Media LLC*

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2016, the foregoing was served by CM/ECF on counsel of record for all parties to this action. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Elizabeth A. McNamara
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